

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

1. KYLE GOINS,)	
2. KARI GOINS,)	
)	
Plaintiffs,)	
)	
v.)	Case No.:17-cv-347-JHP-JFJ
)	
1.CSAA FIRE & CASUALTY INSURANCE)	
COMPANY, a foreign for profit Insurance)	
Corporation,)	
)	
Defendant.)	

**PLAINTIFFS’ APPLICATION FOR LEAVE ALLOWING UNREDACTED
OPPOSITION TO MOTION FOR PARTIAL SUMMARY JUDGMENT AND EXHIBITS
TO BE FILED UNDER SEAL (Document 39)**

Comes Now Plaintiffs, Kyle Goins and Kari Goins, who respectfully request that the Court order that the unredacted version of Plaintiffs’ Opposition to Motion for Partial Summary Judgment and Exhibits 4, 5 and 8, be filed under seal. The Plaintiffs redacted information in their filed Opposition and Exhibits 4, 5, and 8 (document #39) as the motion and the exhibits contain information that was received during the discovery process from the Defendant, CSAA Fire & Casualty Insurance Company, marked as “Confidential”.

On September 28, 2017, the court signed and caused to be filed a stipulated protective order entered into between the parties in this case (Document 21). Exhibits 4,5 and 8 contain documents and/or deposition testimony that the Defendant has deemed to be confidential. However, the content of these documents is essential for the Plaintiffs to utilize to fully explain the actions taken by the Defendant in the investigation, evaluation and adjustment of the Plaintiffs’ claim and in order to fully address and support the factual basis and arguments set forth in their Opposition to Defendant’s Motion for Partial Summary Judgment. Plaintiffs have filed a

redacted version of their Opposition to the Motion for Summary Judgment (document 39) which contains limited references and arguments pertaining to information contained within these documents in order to comply with the time deadlines, pending a ruling by the court on their application to file these un-redacted documents under seal.

For the above stated reasons, the Plaintiffs respectfully request that they be permitted to file an unredacted version of their Opposition to Motion for Partial Summary Judgment and Exhibits 4, 5 and 8 under seal in order to comply with the confines of the protective order so that the Court can have full access to all necessary information in ruling on the Defendant's Motion for Partial Summary Judgment..

Respectfully Submitted,

/s/ Matthew M. McGrew

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF MAILING

I hereby certify that on the 4th day of May, 2018, I electronically transmitted the foregoing document, Plaintiffs' Motion to File Unredacted Opposition to Partial MSJ and Exhibits Under Seal to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Gerard Pignato
Jace T. White

Counsel for Defendant

S/ Matthew M. McGrew
Matthew M. McGrew